applied to claim 26, but clarification in a further non-final action is requested. No claims are amended, and therefore claims 1-11 and 15-24 and 26-30 are pending.

The Office Action does not accept or object to the drawings using one of the check boxes on the Office Action Summary sheet. Applicants assume that the drawings are acceptable, and respectfully request review of the drawings and an indication of acceptance or objection in the next communication.

II.   ISSUES RELATING TO PRIOR ART

A.   CLAIMS 1-11, 15-24, 26-30

Claims 1-11 and 15-24 and 26-30 stand rejected under 35 U.S.C. § 103 as allegedly unpatentable over Reisman, U.S. Pat. No. 6,557,054 in view of Bergman, U.S. Pat. No. 6,564,263. The rejection is respectfully traversed.

1.   Claim 1 recites a method having steps "carried out by a personal server that executes at the client," as stated in the final line of Claim 1. In contrast, Reisman does not show a server that executes at the client. Reisman FIG. 12 shows all servers (136, 132) separated from the client (local station 122) by the telephone network, ISP, and Internet. Bergman also does not show a server that executes at the client. Bergman FIG. 1 shows all archive servers (102) separated from the client (103). Bergman FIG. 2 also shows archive servers (202) and content adaptation/filter servers (203, 204) as separated from the client (205, 206, 207).

2.   Claim 1 recites a method that "retrieves updated channel content ... without communicating the channel selection information across the network." Reisman, however, communicates all selection information across the network (col. 15 line 22). Bergman also communicates content confirmation across the network (col. 5 lines 15-65).

3.   Claim 1 recites a method that synthesizes original, personalized electronic documents from updated channel content from various sources. But Reisman, at col. 17 line 59

to col. 18 line 46 as referenced in the Office Action, only shows updates of a single "news magazine" product from a single source with discrete new "issues". Reisman does not show the combination and synthesis of updated channel content from different sources into an entirely original, personalized electronic document. Reisman's other examples likewise show only updates of a single item from its own original source rather than the synthesis of updates from different sources into a new document.

Neither Reisman nor Bergman teach or suggest a method carried out by a personal server that executes at the client, or a method that retrieves updated channel content ... without communicating the channel selection information across the network, or a method that that synthesizes original, personalized electronic documents from updated channel content from various sources, as claimed. Therefore, a combination of Reisman and Bergman fails to establish a *prima facie* case of unpatentability under 35 U.S.C. § 103.[1]

The Office Action contends that Bergman discloses the claimed synthesis step. While both Applicant's claims and Bergman use the term "synthesis," Applicant's usage refers to a process and method that is distinct from and unrelated to Bergman. In Applicant's claims, "synthesizing" refers to the combination of different channel content from various sources into a single electronic document, or multiple electronic documents. In Bergman, however, "synthesis" refers to the assembly of various components, or "modalities" of a single multimedia content unit into a form suitable for consumption based on the characteristics of the delivery platform and medium (col. 6, lines 15-38 and col. 7 lines 1-25).

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[1] Applicant identified the same three differences between the claims and Reisman in Applicant's prior reply. The present Office Action does not address these remarks with respect to Reisman, merely saying that they are "moot" in light of the new rejections based on Reisman and Bergman. It appears that the examiner introduced Bergman because the amended claims introduced the term "synthesizing," and Bergman uses the term "synthesis". However, the three arguments regarding Reisman in Applicant's last reply are not refuted in the Office Action. The first two arguments still apply to Reisman. Furthermore, Bergman does not even remotely address these two points.

For example, for a given multimedia recording of a single event (which Bergman refers to as a "terminal object"), such as a baseball game, the various component modalities might be video, audio, metadata (e.g., box score information), still images, and textual descriptions of the game. Depending on the characteristics of the device to which delivery is targeted, different combinations and fidelity levels of these component modalities (such as just text for a text-only device, or text plus metadata, or all of them combined) may be "synthesized" into a final delivery form (fig. 16).

The meaning of "synthesizing" in Applicant's claims differs from Bergman's use in a number of important ways. First, in Bergman, synthesis refers, as explained above, to the reconstruction of a multimedia representation of a single event or terminal object from its component modalities. Bergman does not disclose a method wherein a user may select content from various sources (multiple terminal objects, in Bergman's terminology), and have them synthesized together into a single electronic document based on the user's specification.

Bergman describes a Multimedia Content Description Framework (MCDF), which provides for an InterObject Description Scheme (IODS) that can describe relationships between multiple terminal objects (col. 15 line 5 to col. 20 line 54). However, the MCDF IODS is a *descriptive framework* for describing fixed, pre-existing relationships between terminal objects stored at remote server archives. MCDF does not provide a *constructive method* for an end-user at the client to specify novel, arbitrary, and personalized relationships between terminal objects, as reflected in Applicant's claims.

Second, in Bergman, the synthesis process occurs at remote archive, proxy content, and adaptation filter servers (FIG. 1, 2). In Applicant's claims, the synthesis occurs at a personal server that executes at the client. Furthermore, the claimed method performs updates and synthesis without communicating channel selection information across the network, thereby

keeping the channel selection information private. In contrast, Bergman explicitly communicates all synthesis information across the network, thereby making the synthesis information public (col. 5 lines 15-65).

For at least these reasons, Claim 1 recites subject matter not taught or suggested by Reisman or Bergman, either separately or in combination. Reconsideration and withdrawal of the rejection is respectfully requested.

Each of Claims 2-11 and 15-24 depends, directly or indirectly, on Claim 1, and therefore includes each and every feature identified above for Claim 1. Therefore, Claims 2-11 and 15-24 are allowable over Reisman in view of Bergman for the reasons set forth above for Claim 1. Claim 14 and Claim 25 are canceled, and therefore the rejection is moot with respect to Claim 14 and Claim 25.

Moreover, each of Claims 2-11 and 15-24 contains at least one feature that independently renders it patentable over Reisman and Bergman. For example, Claim 2 recites a method allowing the user to create and store at the client, custom, personalized virtual space organization information. Reisman (col. 18 line 52 to col.19 line 58) describes two examples, a news magazine and a retail catalog, that are updated via the transporter component. In both examples, the layout and space organization information associated with the news magazine and retail catalog are defined and created by the magazine and catalog publishers at the server. Reisman does not show a method where a user can create and store a custom, personalized virtual space organization. Reisman (col.21 lines 4-47) describes two more examples of computer software updates, and packaging of the transporter with UI/DB software. As with the previous examples, the updates described by Reisman, such as new tax forms from the government, are pre-defined at the server and there is no method for the user to create and store custom, personalized virtual space organization information at the client. Bergman's InterObject Description Scheme (col. 15

line 5 to col. 20 line 54) is a *descriptive framework* for describing fixed, pre-existing

relationships between terminal objects stored at remote server archives. MCDF is not, as in

Applicant's claims, a *constructive method* for an end-user at the client to specify novel, arbitrary,

and personalized relationships between terminal objects.

Furthermore, Claim 2 recites a method comprising the step of synthesizing one or more

electronic documents that contain the updated channel content from various sources. In

Reisman's magazine, catalog, software update, and packaging examples, each document is

generated using updates from its own source only (for the magazine, updated magazine content

from the magazine source, for the catalog, updated catalog content from the catalog source, and

for software updates and packaging, updated software content from the software source).

Reisman does not show a method where content from various sources are combined and

synthesized into an entirely new, personalized document at the client. Again, Bergman's

InterObject Description Scheme (col. 15 line 5 to col. 20 line 54) is a *descriptive framework* for

describing fixed, pre-existing relationships between terminal objects stored at remote server

archives. MCDF is not, as in Applicant's claims, a *constructive method* for an end-user at the

client to specify novel, arbitrary, and personalized relationships between terminal objects.

Claim 3 recites a method for receiving an update specification, identifying an update

method and a time value, and issuing a request in accordance with those specifications. Reisman

(col.21 line 4 to col.22 line 53) describes examples of computer software updates and packaging

the transporter to allow software publishers to incorporate the transporter's capabilities. Reisman

does not describe a method for receiving an update specification that identifies an update method

to be used for the content update, nor does Reisman describe the use of a time value as part of

the update specification. Reisman (col.24 lines 14-63) further elaborates on the utility of

packaging the transporter into other software products, but still does not discuss the use of an

update specification containing an update method identification, or a time value. Bergman also does not disclose a method for receiving update specifications.

Claim 5 recites a method wherein each rendering context comprises a style sheet, template, script, helper reference, or applet. Reisman (col. 21 line 4 to col.22 line 53 and col.23 lines 7-64) do not discuss style sheets, templates, scripts, helper references, or applets. Bergman also does not discuss style sheets, templates, scripts, helper references, or applets.

Claims 26-28 are independent claims having the same features as Claim 1, but expressed in different formats. Claims 26-28 distinguish over Reisman and Bergman in the same ways set forth above for Claim 1. Therefore, Claims 26-28 are allowable over Reisman and Bergman for the same reasons given above.

Independent Claim 29 distinguishes over Reisman in three ways:

1.   Claim 29 recites a personal server that executes at the client. Reisman does not show a server that executes at the client. Reisman FIG. 12 shows all servers (136, 132) separated from the client (local station 122) by the telephone network, ISP, and Internet. Bergman also does not show a server that executes at the client. Bergman FIG. 1 shows all archive servers (102) separated from the client (103). Bergman FIG. 2 also shows archive servers (202) and content adaptation/filter servers (203, 204) as separated from the client (205, 206, 207).

2.   Claim 29 recites a personal server that retrieves updated channel content without communicating the channel selection information across a network. Reisman, col. 15 line 22, communicates all selection information across the network. Bergman also communicates content confirmation across the network (col. 5 lines 15-65).

3.   Claim 29 recites a personal server that synthesizes original, personalized electronic documents from updated channel content from various sources. This language distinguishes over Reisman (col. 17 line 59 to col. 18 line 46, as referenced in the Office Action)

because Reisman only shows updates of a single "news magazine" product from a single source with discrete new "issues". Reisman does not show the combination and synthesis of updated channel content from different sources into an entirely new and unique electronic document. Reisman's other examples likewise show only updates of a single item from its own original source, rather than the synthesis of updates from different sources into a new document.

Neither Reisman nor Bergman teach or suggest a method carried out by a personal server that executes at the client, or a method that retrieves updated channel content ... without communicating the channel selection information across the network, or a method that that synthesizes original, personalized electronic documents from updated channel content from various sources, as claimed. Therefore, a combination of Reisman and Bergman fails to establish a *prima facie* case of unpatentability under 35 U.S.C. § 103.

The Office Action contends that Bergman describes the claimed synthesis process. This is incorrect. The "synthesis" of Bergman is not the same as the claimed synthesis process for all the reasons set forth above with respect to Claim 1.

Regarding the "added limitations" in Claim 29, referred to in the Office Action, Reisman fails to provide the same structure. Reisman (at col. 43 and col. 49) shows methods for managing, relocating, coding, and rewriting links embedded in web content, but does not show a page synthesizer that synthesizes one or more original, personalized electronic documents that contain updated channel content from various sources. Reisman col. 55 shows a method for retrieving updated music information, but does not show a page synthesizer that synthesizes one or more original, personalized electronic documents that contain updated channel content from various sources. For this reason, and because "synthesis" as claimed is distinct and different from any disclosure of document synthesis in Reisman, Claim 29 is patentably distinct from Reisman.

Claim 30 depends on Claim 29, and therefore includes each and every feature identified above for Claim 29. Therefore, Claim 30 is allowable over Reisman and Bergman for the same reasons set forth above for Claim 29.

Reconsideration and withdrawal of the rejections are respectfully requested.

B.   CLAIMS 12 AND 13

Claims 12 and 13 stand rejected under 35 U.S.C. § 103 as allegedly unpatentable over Reisman in view of Linden, U.S. Pat. No. 6,360,254. The rejection is respectfully traversed.

The Office Action does not properly characterize the teachings of Linden and Reisman, separately or in combination. Linden shows a system where URL links are encoded with an authentication token at a remote server, and are then sent to users via e-mail. When users activate those URL links, they are returned to the remote server where the encoded authentication token in the URL is validated to allow access to a private resource.

In contrast, Claim 12 recites a method where a content server embeds multiple content tokens (not authentication tokens) into channel content (not URL links). This channel content is received by the client (not via e-mail), and the tokens are replaced by other channel content or personal content at the client. The client does not use these tokens to return to the remote server as in Linden.

Neither Linden nor Reisman show a personal server executing at the client. Neither Linden nor Reisman show an iteration of a replacement step over channel content by a personal server executing at the client.

Further, Linden and Reisman do not contain any suggestion, express or implied, that they be combined, or combined in the manner suggested. In fact, Reisman teaches away from a combination with Linden. Reisman describes a "transporter [which] automatically effects communication sessions" (Abstract) whereas in Linden, the user must manually access and

activate private URLs sent through e-mail. Linden's manual user interaction is precisely what Reisman's invention intends to reduce or eliminate.

Moreover, Reisman describes a transporter that installs resources to the user station for local access (abstract, FIG. 6, FIG.12), whereas in Linden, the "private data records" are stored on the remote server, not on the user station, and require remote access, not local access (abstract, and 42, 46 in FIG. 1). In other words, the user access validation that Linden provides, based on tokens, is not necessary in Reisman since resources are installed locally. Therefore, a person of ordinary skill in the art, at the time the present application was filed, would have no reason to combine Reisman and Linden. A skilled artisan would have no reason to consider using token-based user access validation for access to local resources.

The specific passages cited in the Office Action do not show the features of the claims identified above. For example, the Office Action relies on Reisman col. 21, lines 4-47. However, this passage discusses updates to software products, such as updated tax forms for tax software, and discusses packaging Reisman's transporter component together with UI/DB authoring tools so that products created using the authoring tools will automatically include the functionality of the transporter. Reisman makes no reference to a virtual space specification, or to a page organization specification, nor does Reisman describe or refer to the replacement of any type of tokens in the updated channel content with either other channel content, or personal content information located at the client.

The Office Action further relies on Reisman col. 29, lines 8-61, which elaborate on the packaging of Reisman's transporter component together with UI/DB authoring tools. Here, Reisman provides further details on the various levels of transporter functionality that may be offered to software product authors who are building UI/DB products that incorporate the transporter. However, Reisman does not describe or refer to the replacement of any type of

tokens in the updated channel content with either other channel content, or personal content information located at the client.

The Office Action also relies on Linden FIG. 1, and col. 3, line 31 to col. 4, line 56. While Linden uses the term "token", Linden's tokens are distinct in form, function, and purpose from the tokens referred to in Claim 12. First, in Linden, tokens are generated at the server, sent to users via e-mail, and then returned to the server again via a URL. In contrast, in Claim 12, the tokens are embedded in updated channel content, which are retrieved by the user, and are never returned to the server.

Second, in Linden, the user does not replace the token. In fact, for Linden's scheme to work, the token must not be replaced, otherwise the validation step will fail. In Claim 12, the tokens embedded in the updated channel content are replaced at the user station with other updated channel content or personal content information located at the client.

Third, in Linden, the token acts a unique identifier. In Claim 12, the token is not unique, but rather is a placeholder which will be replaced by updated channel content or personal content information located at the client. As such, a token may be embedded multiple times in the updated channel content, and therefore the tokens are not necessarily unique, as they must be in Linden.

Fourth, in Linden, the token is associated with a user record stored in a database on the server. In Claim 12, the tokens are not associated with any information stored on the server. To the contrary, the tokens in Claim 12 are associated with and refer to updated channel content or personal content information located at the client.

Finally, Bergman includes no discussion of the use of tokens.